

REMARKS

Claims 1-9, 11-15, 17-18, 21-22, 24-26, 32-34, and 41-44 are currently pending in the application. No claims have been amended, canceled, or added. Applicant respectfully requests reconsideration of the application in view of the following remarks.

The amendments made in response to the Office Action dated May 6, 2004 stand objected to under 35 U.S.C. § 132 and 37 C.F.R. 1.121. According to the Office Action, the amendments appear to introduce new matter not supported by the original disclosure. Applicant respectfully disagrees.

Applicant respectfully submits that amendments made to claims 1 and 32, and the subject matter of previously-added claims 42-44 are fully supported by the specification. More specifically, support for amended claims 1, 32, and previously-added claims 42-44 can be found on page 8, lines 20-page 10, line 9 of the application as originally filed. In addition, Applicant respectfully submits that amendments made to claims 17-18, 21-22, 24-26, and the subject matter of previously-added claim 41 are fully supported by the specification. More specifically, support for amended claims 17-18, 21-22, 24-26, and previously-added claim 41 can be found on page 8, line 7-page 10, line 9 of the application as originally filed. Applicant respectfully submits that no new matter has been added. Withdrawal of the § 132 objection is respectfully requested.

Claims 1-9, 11-15, 17-18, 21-22, 24-26, 32-34, and 41-44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,913,052 to Beatty et al. ("Beatty") in view of U.S. Patent No. 6,144,962 to Weinberg et al. ("Weinberg").

Beatty discloses a system and method for debugging software to control a digital signal processor (DSP) and a general purpose computer employing either the system or the method. When the DSP is emulated, the system includes an architectural display circuitry and a software simulation circuitry.

Weinberg discloses a visual WEB site analysis program. The program is implemented as a collection of software components for providing a variety of features for facilitating an analysis and management of Web sites and Web site content.

Independent claim 1 is directed to a method for providing a visualization of an underlying architecture of a software system. Beatty discloses a system and method for debugging software to control a digital signal processor. The Office Action concedes that Beatty does not explicitly disclose displaying, on a web page, a graphical representation of an underlying architecture. Weinberg has been cited in the Office Action as teaching, in an analogous environment, displaying, on a web page, a graphical representation of an underlying architecture.

Applicant respectfully submits that the cited combination of Beatty and Weinberg fails to teach, suggest, or render obvious at least one of the distinguishing features of independent claim 1, namely, rendering, via a visualizer, a plurality of graphical elements representative of an architectural components, the graphical elements forming a graphical representation of an underlying architecture, the graphical representation dependent on a particular mode of a plurality of modes of operation of the visualizer. In contrast to claim 1, Beatty teaches a system with one mode, i.e., a debugging mode. As such, the graphical representation of the underlying architecture is not dependent on a particular mode of the plurality of modes of operation as in claim 1. In addition, Weinberg fails to remedy the deficiencies of Beatty in that Weinberg also does not teach, suggest, or render obvious a graphical representation dependent on a particular mode of a plurality of modes of operation of a visualizer. Applicant respectfully submits that independent claim 1 distinguishes over the cited combination of Beatty and Weinberg. Withdrawal of the rejection of independent claim 1 is respectfully requested.

Dependent claims 2-9, 11-15, and 42-44 depend from and further restrict independent claim 1 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 2-9, 11-15, and 42-44 distinguish over Beatty in view of Weinberg and are in condition for allowance. Withdrawal of the rejection of dependent claims 2-9, 11-15, and 42-44 is respectfully requested.

In addition, Applicant respectfully submits that the cited combination of Beatty and Weinberg fails to teach or suggest at least one of the distinguishing features of dependent claim 42, namely, a visualizer rendering graphical elements in a direct interaction simulation mode. In Beatty, a system with one mode, i.e., a debugging mode is disclosed. In addition, the system of

Beatty further comprises a software display circuitry for displaying a source code representation of a digital signal processor (DSP) and an object software display circuitry for displaying an object code representation of the DSP. However, the software display circuitry and the object software display circuitry are implemented while the system is operating in the debugging mode and not the direct interaction simulation mode as in claim 42. Weinberg fails to remedy the deficiencies of Beatty in that Weinberg also does not teach, suggest, or render obvious the direct interaction simulation mode as claimed. Withdrawal of the rejection of claim 42 as being unpatentable over Beatty and Weinberg is respectfully requested for this additional reason.

Additionally, Applicant respectfully submits that the cited combination of Beatty and Weinberg fails to teach or suggest at least one of the distinguishing features of dependent claim 43, namely, a visualizer rendering graphical elements in a prototype simulation mode. In Beatty, a system with one mode, i.e., a debugging mode is disclosed. In addition, the system of Beatty further comprises a software display circuitry for displaying a source code representation of a digital signal processor (DSP) and an object software display circuitry for displaying an object code representation of the DSP. However, the software display circuitry and the object software display circuitry are implemented while the system is operating in the debugging mode and not the prototype simulation mode as in claim 43. Weinberg fails to remedy the deficiencies of Beatty in that Weinberg also does not teach, suggest, or render obvious the prototype simulation mode as claimed. Withdrawal of the rejection of claim 43 as being unpatentable over Beatty and Weinberg is respectfully requested for this additional reason.

Furthermore, Applicant respectfully submits that the cited combination of Beatty and Weinberg fails to teach or suggest at least one of the distinguishing features of dependent claim 44, namely, a visualizer rendering graphical elements in an architecture monitor mode. In Beatty, a system with one mode, i.e., a debugging mode is disclosed. In addition, the system of Beatty further comprises a software display circuitry for displaying a source code representation of a digital signal processor (DSP) and an object software display circuitry for displaying an object code representation of the DSP. However, the software display circuitry and the object software display circuitry are implemented while the system is operating in the debugging mode and not the architecture monitor mode as in claim 44. Weinberg fails to remedy the deficiencies of Beatty in that Weinberg also does not teach, suggest, or render obvious the architecture

monitor mode as claimed. Withdrawal of the rejection of claim 42 as being unpatentable over Beatty and Weinberg is respectfully requested for this additional reason.

Independent claim 32 is directed to a computer-readable medium having stored thereon sequences of instructions. Applicant respectfully submits that the cited combination of Beatty and Weinberg fails to teach, suggest, or render obvious at least one of the distinguishing features of independent claim 32, namely, rendering, via a visualizer, a plurality of graphical elements representative of an architectural components on a graphical display, the graphical elements forming a graphical representation of an underlying architecture, the graphical representation dependent on a particular mode of a plurality of modes of operation of the visualizer.

In contrast to claim 32, Beatty teaches a system with one mode, i.e., a debugging mode. As such, the graphical representation of the underlying architecture is not dependent on a particular mode of the plurality of modes of operation as in claim 32. In addition, Weinberg fails to remedy the deficiencies of Beatty in that Weinberg also does not teach, suggest, or render obvious a graphical representation dependent on a particular mode of a plurality of modes of operation of a visualizer. Applicant respectfully submits that independent claim 32 distinguishes over the cited combination of Beatty and Weinberg. Withdrawal of the rejection of independent claim 32 is respectfully requested.

Dependent claims 33-34 depend from and further restrict independent claim 32 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 32, dependent claims 33-34 distinguish over Beatty in view of Weinberg and are in condition for allowance. Withdrawal of the rejection of dependent claims 33-34 is respectfully requested.

Independent claim 41 is directed to an application service provider (ASP) system for visualizing an architecture of another distinct system. Applicant respectfully submits that the cited combination of Beatty and Weinberg fails to teach, suggest, or render obvious at least one of the distinguishing features of independent claim 41, namely, a visualizer for receiving a transformed datafile and visualizing an architecture, the visualizer operating in one of a plurality of modes of operation.

In contrast to claim 41, Beatty teaches a system with one mode, i.e., a debugging mode. In addition, the system of Beatty further comprises a software display circuitry for displaying a source code representation of a digital signal processor (DSP) and an object software display circuitry for displaying an object code representation of the DSP. However, the software display circuitry and the object software display circuitry are implemented while the system is operating in the debugging mode. As such, the graphical representation of the underlying architecture is not dependent on a particular mode of the plurality of modes of operation as in claim 41. In addition, Weinberg fails to remedy the deficiencies of Beatty in that Weinberg also does not teach, suggest, or render obvious a graphical representation dependent on a particular mode of a plurality of modes of operation of a visualizer. Applicant respectfully submits that independent claim 41 distinguishes over the cited combination of Beatty and Weinberg. Withdrawal of the rejection of independent claim 41 is respectfully requested.

In addition, neither Beatty nor Weinberg teach a system for visualizing an architecture of *another distinct system*. Instead, Beatty teaches debugging a Digital Signal Processor (DSP) of a computer running the simulation. *See* Beatty, Figure 1 and col. 4, line 54 - col. 5, line 11. Similarly, Weinberg teaches mapping a web site to analyze content and links to URLs and therefore Weinberg does not teach visualizing an architecture of another distinct system. Withdrawal of the rejection of claim 41 as being unpatentable over Beatty and Weinberg is respectfully requested for this additional reason.

In view of the above remarks, Applicant believes the pending application is in condition for allowance.

Dated: Dec. 16, 2004

Respectfully submitted,

By 

Stanley R. Moore

Registration No.: 26,958

JENKENS & GILCHRIST, A PROFESSIONAL
CORPORATION

1445 Ross Avenue, Suite 3200

Dallas, 75202

(214) 855-4500

Attorneys For Applicant